

1 Mark R. Thierman, Nev. Bar No. 8285
mark@thiermanbuck.com
2 Joshua D. Buck, Nev. Bar No. 12187
josh@thiermanbuck.com
3 Leah L. Jones, Nev. Bar No. 13161
leah@thiermanbuck.com
4 THIERMAN BUCK LLP
7287 Lakeside Drive
5 Reno, NV 89511
Tel. (775) 284-1500
6 Fax. (775) 703-5027

7 Christian Gabroy, Nev. Bar No. 8805
christian@gabroy.com
8 Kaine Messer, Nev. Bar No. 14240
kmesser@gabroy.com
9 GABROY LAW OFFICES
The District at Green Valley Ranch
10 170 S. Green Valley Pkwy, Suite 280
Henderson, NV 89012
11 Tel. (702) 259-7777
Fax. (702) 259-7704

12 *Attorneys for Plaintiff Alexis Harris*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 ALEXIS HARRIS, on behalf of herself
16 and all others similarly situated,

17 Plaintiff,

18 vs.

19 HAT WORLD, INC. d/b/a and a/k/a LIDS
20 LOCKER ROOM; DOES 1 through 50;
inclusive,

21 Defendant(s).

Case No: 2:19-cv-00882-JAD-EJY

**JOINT STIPULATION AND
ORDER REGARDING VOLUNTARY
RESOLUTION**

JOINT STIPULATION REGARDING VOLUNTARY RESOLUTION

The parties, by and through their respective counsel of record, submit the following Stipulation and Proposed Order to stay this action for 30 days pending the finalization of the voluntary resolution recently reached by the parties:

1. WHEREAS, on May 24, 2019, Defendant Hat World, Inc. d/b/a Lids ("Defendant") removed this matter to federal court (ECF No. 1, p. 1);

2. WHEREAS, on July 9, 2019, Defendant's counsel presented to Plaintiff's counsel a courtesy copy, and advised Plaintiff of Defendant's intent to move to compel arbitration absent an agreement by Plaintiff to voluntarily submit to binding individual arbitration in accordance with the arbitration agreement;

3. WHEREAS, the parties have since been engaged in discussions related to the possible voluntary submission of this matter to arbitration;

4. WHEREAS, on September 25, 2019, the parties reached an agreement in principal to resolve this action on an individual basis;

5. WHEREAS, the parties anticipate finalizing their settlement agreement in the next 30 days;

6. WHEREAS, the parties agree that a 30-day stay of all proceedings in this action would conserve judicial resources while the parties finalize their settlement;

NOW, THEREFORE, the parties hereby stipulate and agree that, subject to the Court's approval, all proceedings in this matter should be stayed for thirty days, effective from the date of this Stipulation, pending the finalization of their settlement agreement.

[Signature Page Follows]

GABROY LAW OFFICES

170 S. Green Valley Pkwy., Suite 280
Henderson, Nevada 89012
(702) 259-7777 FAX: (702) 259-7704

Respectfully submitted,

Dated this 25th day of September 2019.

Dated this 25th day of September 2019.

/s/ Kaine Messer

Christian Gabroy
Nev. Bar No. 8805
Kaine Messer
Nev. Bar. No. 14240
GABROY LAW OFFICES
170 S. Green Valley Parkway, Ste 280
Henderson, NV 89012
Tel: (702) 259-7777
Fax: (702) 259-7704

/s/ Robert McCoy

Robert McCoy
Nev. Bar No. 9121
Joni Jamison.
Nev. Bar No. 11614
KAEMPFER CROWELL
1980 Festival Plaza Drive, Suite 650
Las Vegas, NV 89135
Tel: (702) 792-7000
Fax: (702) 796-7181

Mark R. Thierman
Nev. Bar No. 8285
Joshua D. Buck,
Nev. Bar No. 12187
Leah L. Jones,
Nev. Bar No. 13161
THIERMAN BUCK LLP
7287 Lakeside Drive
Reno, NV 89511
Tel: (775) 284-1500
Fax: (775) 703-5027

Cheryl A. Sabnis
Pro hac vice application forthcoming
KING & SPALDING LLP
101 Second Street, Suite 2300
San Francisco, CA 94105
Tel: (415) 318-1200
Fax: (415) 318-1300

Attorneys for Defendant

Attorneys for Plaintiff

ORDER

Having reviewed Plaintiff Alexis Harris ("Plaintiff") and Defendant Hat World, Inc. d/b/a Lids' (collectively, the "Parties") Joint Stipulation Regarding Voluntary Resolution (the "Stipulation"), and good cause appearing therefor, the Court hereby approves the Parties' stipulation and ORDERS that all proceedings in this action shall be stayed for 30 days through and including October 25, 2019, by which date the parties must either (a) file a stipulation of dismissal, or (b) in the event the settlement is not finalized, file a joint status report regarding the status of the settlement.

IT IS SO ORDERED.

September 26, 2019
Date


UNITED STATES MAGISTRATE JUDGE